

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HANGZHOU CHIC INTELLIGENT )  
TECHNOLOGY CO., LTD. and UNICORN )  
GLOBAL, INC., )  
)  
Plaintiffs, ) Case No.: 20-cv-4806  
)  
v. ) Judge Thomas M. Durkin  
) Magistrate Judge Jeffrey Cole  
THE PARTNERSHIPS AND )  
UNINCORPORATED ASSOCIATIONS )  
IDENTIFIED ON SCHEDULE A, )  
)  
Defendants. )  
)

**DECLARATION OF ARTHUR TAN-CHI YUAN  
IN SUPPORT OF OPPOSITION TO MOTION TO VACATE**

I, Arthur Tan-Chi Yuan, declare as follows:

1. I am an attorney licensed in Illinois and employed at the law firm Loeb & Loeb LLP. I represent Plaintiffs Hangzhou Chic Intelligent Technology Co. and Unicorn Global, Inc.

2. I have personally reviewed all materials provided in the attached Exhibits and have firsthand knowledge of the statements below. If called as a witness, I could and would testify to the statements made herein.

3. On October 20, 2020, Teri Novak, on behalf of Amazon, provided the account balances for various defendants in this matter, including Gyroor US. Ms. Novak also confirmed that day that those assets had been frozen. A true and correct copy of that correspondence is attached as Exhibit A.

4. On November 25, Loeb & Loeb LLP launched a website containing the Third Amended Complaint, the preliminary injunction order, and contact information for Christopher

Binns, who represented Plaintiffs. That web address is: <https://www.loeb.com/en/general/20-cv-4806>. After the Court entered the modified preliminary injunction in December 2020, the web page was updated to replace the early order with the modified one. After Mr. Binns departed from Loeb & Loeb LLP, the contact information was removed from the web page.

5. On December 4, Stephen Vegh left a voicemail for one of Plaintiffs' attorneys of record to discuss this case. Mr. Binns subsequently communicated with Mr. Vegh. On December 6, Mr. Binns emailed Mr. Vegh with many case documents, including the Third Amended Complaint and the preliminary injunction moving papers and order. A true and correct copy of the transmittal email is attached as Exhibit B. Due to the large number of files in the zip file attached to this email, I have not included all of the attachments here. Instead, I am including only a true and correct copy of the version of Schedule A to the Third Amended Complaint that Mr. Binns sent Mr. Vegh on December 6, 2020. A true and correct copy of that schedule, as sent to Mr. Vegh on December 6, is attached as Exhibit C. The schedule shows that all defendant names, except for that of "GYROOR US," were redacted.

6. Mr. Binns and Mr. Vegh had subsequent correspondence, including on December 28, 2020. On that day, Mr. Binns asked Mr. Vegh whether he would accept service on behalf of his clients, and Mr. Vegh stated that he would not. A true and correct copy of that correspondence is attached as Exhibit D.

I declare under penalty of perjury that the foregoing is a true and correct.

Executed on August 19, 2021  
Chicago, IL

/s/ Arthur Tan-Chi Yuan  
Arthur T. Yuan

## **Exhibit A**

---

**From:** Novak, Teri <TeriNovak@dwt.com>  
**Sent:** Tuesday, October 20, 2020 11:47 AM  
**To:** Christopher Binns; Brand Protection HB001  
**Cc:** Adam Kelly; Sarah Kunzendorf  
**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

**This email originated from outside of Loeb's Network.**

Yes, the assets listed are frozen.

Thank you,

**Teri Novak** | Davis Wright Tremaine LLP

Paralegal

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8729 | Fax: (206) 757-7700

Email: [terinovak@dwt.com](mailto:terinovak@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

---

**From:** Christopher Binns

**Sent:** Tuesday, October 20, 2020 9:41 AM

**To:** Novak, Teri ; Brand Protection HB001

**Cc:** Adam Kelly ; Sarah Kunzendorf

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

**[EXTERNAL]**

---

Thank you, Teri.

Please confirm that the assets listed in the production are frozen.

All the best,

CB

**Christopher Binns**

*Attorney At Law*



345 Park Avenue | New York, NY 10154

**Direct Dial:** [212.407.4213](tel:212.407.4213) | **Fax:** [646.349.1805](tel:646.349.1805) | **E-mail:** [cbinns@loeb.com](mailto:cbinns@loeb.com)

**Los Angeles | New York | Chicago | Nashville | Washington, DC | San Francisco | Beijing | Hong Kong |**  
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---

**From:** Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Sent:** Tuesday, October 20, 2020 12:07 PM

**To:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>; Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>

**Cc:** Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>; Sarah Kunzendorf <[skunzendorf@loeb.com](mailto:skunzendorf@loeb.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

Good Morning,

Attached is production regarding this matter, being produced on behalf of Amazon.

Thank you,

**Teri Novak** | Davis Wright Tremaine LLP

Paralegal

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8729 | Fax: (206) 757-7700

Email: [terinovak@dwt.com](mailto:terinovak@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

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---

**From:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Sent:** Monday, October 19, 2020 8:19 PM

**To:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>; Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>; Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>

**Cc:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>; Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>; Sarah Kunzendorf <[skunzendorf@loeb.com](mailto:skunzendorf@loeb.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

**Importance:** High

[EXTERNAL]

---

Dear Teri and Michelle,

This is another follow-up on the compliance of the TRO. We look forward to your response.

Best,

Arthur.

---

**From:** Arthur Yuan <[ayuan@loeb.com](mailto:ayuan@loeb.com)>

**Sent:** Friday, October 16, 2020 10:05 AM

**To:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>; [TeriNovak@dwt.com](mailto:TeriNovak@dwt.com); [DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com); [MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)

**Cc:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>; Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>; Sarah Kunzendorf <[skunzendorf@loeb.com](mailto:skunzendorf@loeb.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

**Importance:** High

Dear Teri and Michelle,

I would like to follow-up on the progress of the compliance with the TRO since we provided you the seller IDs. In case it is not clear, we represent the patent owner Hangzhou Chic Intelligent Technology Co., and the exclusive licensee Unicorn Global, as identified in the case caption of the TRO that you have already received. I have attached the patents for your reference in case you need it. Please know that this action is currently under a seal order. Accordingly, we ask that you comply with the seal order and refrain from notifying the Defendants in Schedule A about our correspondence, the lawsuit, and the discovery requests. Failure to abide by the seal order will cause plaintiffs to suffer irreparable harm.

Again, please let us know if you have any other questions.

Best,

Arthur.

---

**From:** Arthur Yuan

**Sent:** Friday, October 9, 2020 12:34 PM

**To:** 'Novak, Teri' <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** 'Crawford, Donna' <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; 'Santiago, Marianne' <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>; Sarah Kunzendorf <[skunzendorf@loeb.com](mailto:skunzendorf@loeb.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

Hi Teri and Michelle,

Please kindly find the update list with one more seller IDs found. One of them is no longer there at the moment but I think upon discovery, you should be able to locate it based on the merchant name as it is my understanding that the merchant name for the one missing on the list is quite unique.

Best,  
Arthur.

---

**From:** Arthur Yuan

**Sent:** Thursday, October 8, 2020 9:59 PM

**To:** 'Novak, Teri' <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

Hi Teri,

Please kindly find the seller IDs that we could find. For some reason, we can't find some of the seller IDs based on the merchant name and the merchant URL any more. Do you think you might be able to locate them as part of the TRO and the discovery request?

Best,  
Arthur.v

**From:** Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Sent:** Thursday, October 8, 2020 6:40 AM

**To:** Arthur Yuan <[ayuan@loeb.com](mailto:ayuan@loeb.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

I'm referring to the seller ID. The merchant name is helpful, but we require the seller ID in order to actually identify the seller with certainty.

Thank you,

**Teri Novak** | Davis Wright TremaineLLP

Paralegal

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8729 | Fax: (206) 757-7700

Email: [terinovak@dwt.com](mailto:terinovak@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

---

**From:** Arthur Yuan <[ayuan@loeb.com](mailto:ayuan@loeb.com)>

**Sent:** Wednesday, October 7, 2020 3:30 PM

**To:** Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

[EXTERNAL]

---

Hi Teri,

We included the merchant names. Is that helpful? Or are you referring to the merchant tokens of the merchant names?

Best,  
Arthur.

**From:** Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Sent:** Thursday, October 8, 2020 6:04 AM

**To:** Arthur Yuan <[ayuan@loeb.com](mailto:ayuan@loeb.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

Arthur,

Can you please provide the Seller IDs for the Amazon sellers as well in the spreadsheet?

Thank you,

**Teri Novak** | Davis Wright TremaineLLP

Paralegal

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8729 | Fax: (206) 757-7700

Email: [terinovak@dwt.com](mailto:terinovak@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

**From:** Arthur Yuan <[ayuan@loeb.com](mailto:ayuan@loeb.com)>

**Sent:** Wednesday, October 7, 2020 2:52 PM

**To:** King, Michelle <[MichelleKing@dwt.com](mailto:MichelleKing@dwt.com)>; Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>; Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086  
[EXTERNAL]

Hi Michelle,

Sorry about the confusion. We were discussing this case under a separate chain and so I believe you already received the Schedule A in excel fil containing sellers on Amazon. Our apologies for the confusion.

Best,

Arthur.

**Arthur Yuan**

*Senior Counsel*

321 North Clark Street, Suite 2300 | Chicago, IL 60654

**Direct Dial:** 312.464.3152 | **Fax:** 312.896.9469 | **E-mail:** [ayuan@loeb.com](mailto:ayuan@loeb.com)

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[www.loeb.com](http://www.loeb.com)

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**From:** King, Michelle <[MichelleKing@dwt.com](mailto:MichelleKing@dwt.com)>

**Sent:** Thursday, October 8, 2020 12:06 AM

**To:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Cc:** Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>; Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Subject:** RE: ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086

**Importance:** High

Good morning. I am following up once again for an excel of the impacted sellers, along with their respective seller ID. Please be advised that we cannot begin working this matter until this information is provided. Thank you.

~Michelle King, Paralegal

T: 206.757.8608

C: 206.247.5519

**From:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>

**Sent:** Monday, October 05, 2020 4:34 PM

**To:** King, Michelle <[MichelleKing@dwt.com](mailto:MichelleKing@dwt.com)>

**Cc:** Brand Protection HB001 <[Brandprotection\\_HB001@loeb.com](mailto:Brandprotection_HB001@loeb.com)>; Crawford, Donna <[DonnaCrawford@dwt.com](mailto:DonnaCrawford@dwt.com)>; Santiago, Marianne <[MarianneSantiago@dwt.com](mailto:MarianneSantiago@dwt.com)>; Novak, Teri <[TeriNovak@dwt.com](mailto:TeriNovak@dwt.com)>

**Subject:** ABC Corporation I, et al. v. The P'ships and Unincorporated Assocs., No.: 20-cv-4086  
[EXTERNAL]



Dear Ms. King:

Attached please find letter from Adam Kelly dated today and correspondence exhibits.

Thank you,

Sarah Kunzendorf

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---

## **Exhibit B**

---

**From:** Christopher Binns <cbinns@loeb.com>  
**Sent:** Sunday, December 6, 2020 1:32 PM  
**To:** svegh@veghlaw.com  
**Cc:** Adam Kelly  
**Subject:** Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806  
**Attachments:** Vegh Law.zip

Hi Stephen:

Per our conversation, please find attached all the relevant moving papers and orders relating to the Complaint, Temporary Restraining Order, and Preliminary Injunction Order.

I will send over a draft of a license agreement upon consolation with our client. Let's touch base on Monday to schedule a call for later in the week.

All the best,  
CB

**Christopher Binns**  
*Attorney At Law*



345 Park Avenue | New York, NY 10154

**Direct Dial:** [212.407.4213](tel:212.407.4213) | **Fax:** [646.349.1805](tel:646.349.1805) | **E-mail:** [cbinns@loeb.com](mailto:cbinns@loeb.com)

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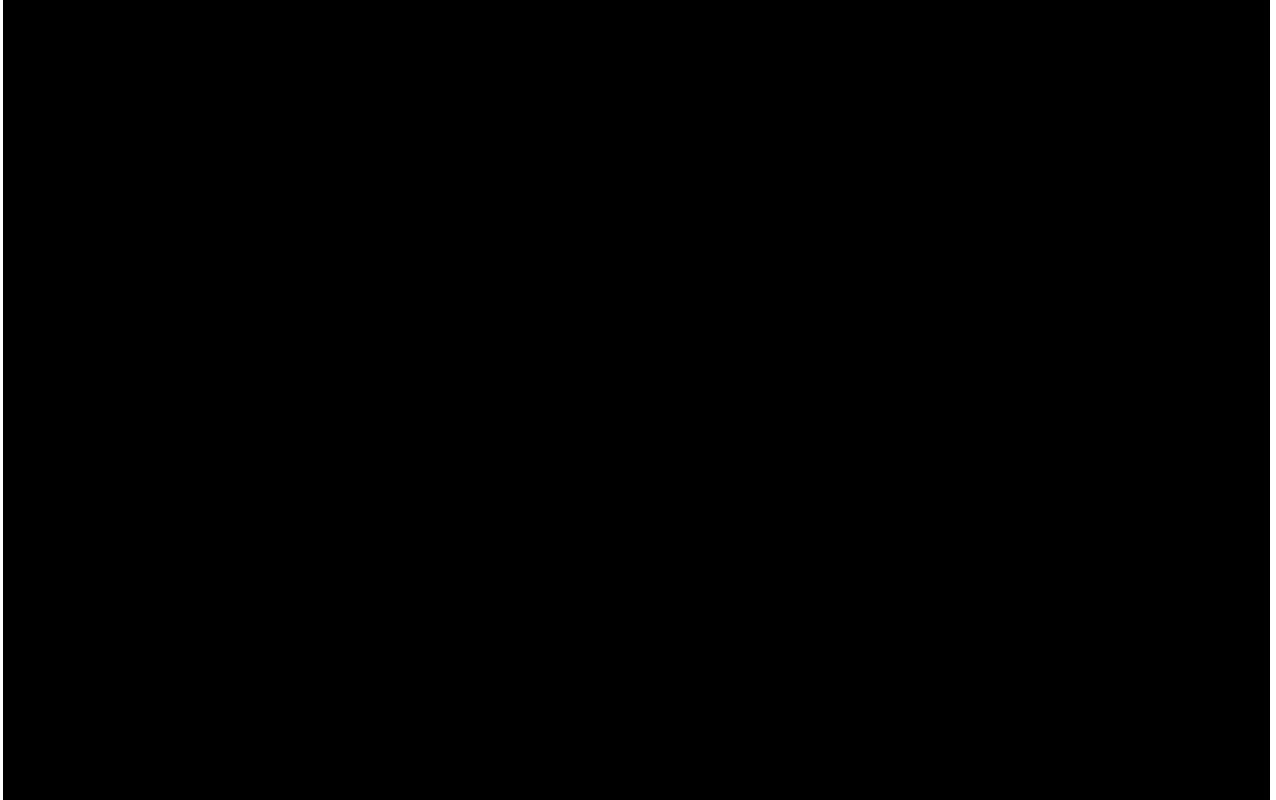
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## **Exhibit C**

**SCHEDULE A**

**EBAY**

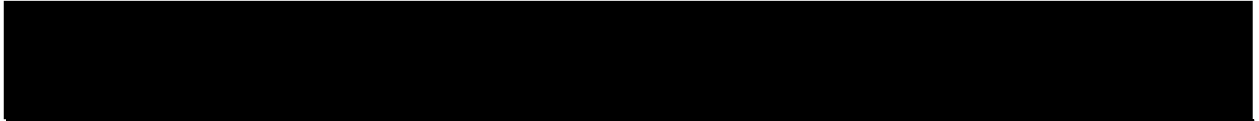


## SCHEDULE A

**AMAZON**

No.	MERCHANT NAME	MERCHANT SELLER ID	ASIN
2.	GYROOR US	A57BIIPQ5F3FT	B07PHFP8GB

**SCHEDULE A**



## **Exhibit D**



---

**From:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>  
**Sent:** Monday, December 28, 2020 2:00 PM  
**To:** Stephen Vegh  
**Subject:** RE: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806

Understood. Thank you for letting me know.

**From:** Stephen Vegh <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)>  
**Sent:** Monday, December 28, 2020 3:00 PM  
**To:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>  
**Subject:** Re: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806

—

No Christopher, as we discussed previously, it is my client's position that Plaintiff must comply with the Hague Service Convention.

Quoting Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>:

Hello Stephen:

Please advise whether you are accepting service on behalf of your clients.

Thank you,

Cb

**From:** Christopher Binns  
**Sent:** Friday, December 11, 2020 1:48 PM  
**To:** 'Stephen Vegh' <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)>  
**Cc:** Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>  
**Subject:** RE: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806

Will do.

**From:** Stephen Vegh <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)>  
**Sent:** Friday, December 11, 2020 1:47 PM  
**To:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>  
**Cc:** Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>  
**Subject:** Fwd: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806

Chris, please call me at this number...310-372-6191. Thanks

----- Forwarded message from Stephen Vegh <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)> -----  
Date: Thu, 10 Dec 2020 17:58:52 -0500  
From: Stephen Vegh <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)>  
Subject: Re: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806  
To: Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>  
Cc: Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>

Chris,

Tomorrow at 11a works, please call me then.

Steve

Quoting Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>:

Hi Stephen,

We will need the following information prior to sending over the proposed license agreement:

- The inventor of the hoverboards your client manufactures or sells;
- The manufacturer (if your client is not the manufacturer);
- The importer;
- Average selling price;
- Sales since 1/1/2019;
- Units sold since 1/1/2019; and
- The names of any other stores operated by your client.

I am unavailable on Thursday, but can speak on Friday at 2 pm EST (1 pm CST/11 am PST). Please let me know if Friday works for you.

All the best,

CB

**From:** Stephen Vegh <[svegh@veghlaw.com](mailto:svegh@veghlaw.com)>  
**Sent:** Tuesday, December 8, 2020 6:41 PM  
**To:** Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>  
**Cc:** Adam Kelly <[akelly@loeb.com](mailto:akelly@loeb.com)>  
**Subject:** Re: Hangzhou Chic v. P'ships, Dkt. No. 20-CV-4806

Hi Christoper, please provide proposed license. How does 11a PST call on Thursday sound?

Thank you,

Stephen Vegh

Quoting Christopher Binns <[cbinns@loeb.com](mailto:cbinns@loeb.com)>:

Hi Stephen:

Per our conversation, please find attached all the relevant moving papers and orders relating to the Complaint, Temporary Restraining Order, and Preliminary Injunction Order.

I will send over a draft of a license agreement upon consultation with our client. Let's touch base on Monday to schedule a call for later in the week.

All the best,

CB

**Christopher Binns**  
*Attorney At Law*



345 Park Avenue | New York, NY 10154

**Direct Dial:** [212.407.4213](tel:212.407.4213) | **Fax:** [646.349.1805](tel:646.349.1805) | **E-mail:** [cbinns@loeb.com](mailto:cbinns@loeb.com)

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Stephen Z. Vegh, Esq.  
1240 Rosecrans Ave. #120  
Manhattan Beach, CA 90266

Tel: (310)980-7440  
[www.veghlaw.com](http://www.veghlaw.com)  
[svegh@veghlaw.com](mailto:svegh@veghlaw.com)



Stephen Z. Vegh, Esq.  
1240 Rosecrans Ave. #120  
Manhattan Beach, CA 90266

Tel: (310)980-7440  
[www.veghlaw.com](http://www.veghlaw.com)  
[svegh@veghlaw.com](mailto:svegh@veghlaw.com)

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1240 Rosecrans Ave. #120  
Manhattan Beach, CA 90266

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